

April 12, 2012
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**SECRETARY, BOARD OF
OIL, GAS & MINING**

Utah Oil, Gas and Mining
1594 W. North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, UT 84114

Attention: Mr. James T. Jensen,
Board Chairman

Re: Request for Agency Action
Docket No. 2012-013
Cause No. 139-90

Dear Mr. Jensen:

Reference is made to the subject Request for Agency Action wherein Newfield Production Company ("NPC") seeks to extend the Board's orders entered in Cause Nos. 139-8 and 139-84 to establish sectional drilling units and authorize up to four producing wells (whether all vertical, all horizontal, or a combination of both) per sectional drilling unit so established or previously established for the production of oil, gas and associated hydrocarbons from the Lower Green River and Wasatch formations underlying the "Central Basin Area," comprised of various sections within Townships 2 South, Ranges 1 through 4 West, USM, 3 South, Ranges 1 through 4 West, USM, and 4 South, Ranges 3 and 4 West, USM, Duchesne and Uintah Counties, Utah.

El Paso Exploration & Production Company, L.P. ("El Paso") currently owns working interests covering lands in and adjacent to the "Subject Lands" (as defined in the subject Request for Agency Action).

El Paso strongly supports the subject application and respectfully encourages the Board of Oil, Gas and Mining to grant NPC's request in order to maximize the ultimate recovery of these hydrocarbon resources, prevent waste which would result from maintaining the current well density pattern and protect the correlative rights of all affected parties.

Thank you for the opportunity to comment on this matter. If you have any questions, please contact Mr. Michael J. Walcher at the letterhead address or by telephone at 713-420-5476.

Sincerely,

EL PASO EXPLORATION & PRODUCTION COMPANY, L.P.



Antonio Pinho

Vice President

International and Western



cc Newfield Production Company
Attention: Ms. Laura Smith

Beatty & Wozniak, P.C.

Attention: Mr. Frederick M. MacDonald